

Annamarie Trombetta  
175 East 96th Street  
New York, New York 10128  
Pro se` Litigant

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The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square , Courtroom  
New York, New York 10007

Re: Annamarie Trombetta v Norb Novicin -Marie Novicin- Estate Auctions Inc.

Dear Judge Abrams:

I am a Pro se` Litigant in Case No.18-CV-0093-RA-HBP. In preparation for the April 25, 2019 meeting with Defendants and Defendant's Attorney Anderson Duff Plaintiff Annamarie Trombetta respectfully submits information Plaintiff writes to respectfully request that this case and claim be stayed pending recognition and resolution of the Plaintiff's evidence. The evidence validates and further supports the laws, the claims and the charges here within this lawsuit. The laws and evidence descriptively and visually enunciated in these submitted documents. They are the quintessential examples related to the laws which prove the infringements and violations that the Defendant's have committed.

Secondly, the Defendants have ignored any responsibility for their actions. All attempts taken by the Plaintiff to offset this lawsuit have been documented. This submission of new information is to further inform the Defendant's Attorney and the Defendants of their actions, violations and liabilities.

Third, Plaintiff Annamarie Trombetta is entering information into the case that was sent via e-mail and regular mail. This information was NOT solicited nor request by Plaintiff Annamarie Trombetta. This information was not known to the Plaintiff upon and at the time of the commencement of this case in February 2018. The new information entered reveals the character of the Defendants and the Defendant's Attorney and will further supports the Plaintiff, Annamarie Trombetta -Artist and Sole Proprietor/ claim and the necessity to facilitate a law suit against Defendant Norb Novicin, Marie Novicin and Estate Auctions Inc.

The Plaintiff's Settlement offer to end this case is within these documents. In summary the amount of settlement can decrease depending upon the information that the Defendant are willing to exchange— for example—the 12 photos listed in the description of the fraudulently sold painting and the Plaintiff's settlement letter sent by an attorney two years ago are two examples how the Defendants can submit requested information to lower the amount of the settlement. In essence the Defendants take part in reducing the settlement by submitting the requested information they should already have in their possession.

#### **FIRST ISSUE WHICH VALIDATES THE SUBMISSION AND THE VIOLATIONS COMMITTED**

In Attorney's Anderson Duff's "Defendants' Memorandum in Support of Motion to Dismiss" the Plaintiff's claims counsel wrote " [ B ]efore proceeding to discovery, a complaint must allege facts suggestive of illegal conduct. Even good legal conclusions must be supported by well-pled factual allegations. Iqbal 556 U.S. at 678 "To survive a motion to dismiss, a

complaint must contain sufficient factual matter, accepted as true, to 'state a claim to relief that is plausible on its face.'" *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)).

"A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." The Defendant's Attorney Anderson Duff further states in his Memorandum "Viewing Plaintiff's claims through this prism, they {the Claims} should be dismissed with prejudice. Plaintiff has not and cannot allege facts that nudge Plaintiff's claims from conceivable to plausible".


Plaintiff Annamarie Trombetta based on the Defendant's Memorandum settlement offer on April 15, 2019 will AGAIN DEFINE each Law, Act, and claim providing Irrefutable PROOF to each claim listed in this lawsuit.

I. **Lanham Act Claim** —The Definition of the claim below states:

**The Trademark Act of 1946 (Lanham Act) (amended by the Trademark Revision Act of 1988) 15 U.S.C. § 1051 et seq.; 19 C.F.R. § 133.1 et seq.**

Trademarks used in interstate commerce are protected under the Trademark Act of 1946, also known as the Lanham Act. **Unlike copyrights and patents, trademarks may be protected under state law, federal law, or both. Registration is not necessary for the protection of a trademark.** See *Two Pesos, v. Taco Cabana*, 505 U.S. 763 at 768 (1992). **A trademark gains protection through distinctiveness and use.** The benefit of federal registration of a mark is that the registration constitutes prima facie evidence of both the validity and ownership of the mark, as well as the right to use the mark in commerce. **Registration also gives the owner the right to prevent the importation of counterfeit goods and the right to bring an action under 15 U.S.C. § 116(d) to prevent the use of counterfeit marks. In addition, a registered mark becomes incontestable after five years of continuous post-registration use.** Title **15 U.S.C. §1125(a)** provides for a cause of action for trademark infringement of unregistered marks. Remedies for infringement of a registered mark are at **15 U.S.C. § 1114 et seq.** Trademark infringement is use in commerce of a mark identical or similar to that used by another seller in a way that confuses the public about the actual source of the goods or services in question. The test for liability for infringement is "likelihood of confusion." The law states that an infringer shall be liable in a civil action to any person who believes that he or she is *likely to be damaged* by the infringer's actions. **Thus, in order to have standing to bring an action under § 1125(a), actual damage need not be shown, but rather a likelihood of damages.** Most courts have held that the plaintiff need not be a direct competitor of the infringer, but that some level of competition is necessary. Some courts have concluded that competition need not exist at all. See *Standing to Bring False Advertising Claim or Unfair Competition Claim Under § 43(a)(1) of Lanham Act*, 124 A.L.R. Fed. 189. **In addition, a plaintiff seeking injunctive relief under this section must only show "likelihood of confusion."** **Injury in terms of actual confusion is necessary to obtain monetary relief. 15 U.S.C. § 1114.** The test for infringement of registered or unregistered marks is the same.

Plaintiff owns a protectable mark —logo —which is part of the artist's signature branding.

Plaintiff Annamarie Trombetta's website has been on the internet since 2003. This exceeds the Lanham Act requirement " **a registered mark becomes incontestable after five years of continuous post-registration use.** " All of the website pages have a copyright circle with the letter C and the statement " All work on this site are © Annamarie Trombetta". In addition there is the  logo. Most importantly there is the artist's personal triangular shaped logo for business evidenced in the artist distinctive personally designed trademark designation logo which is on each and every page of the artist's website.

Plaintiff Annamarie Trombetta enters into evidence xerox copies of the Plaintiff's website.

**EXHIBIT A** -Home Page Website with copyright symbol and statement All rights reserved by Annamarie Trombetta .

**EXHIBIT B**— Biography Page —Estate Auction copied verbatim the first half of my biography.

**EXHIBIT C**— The Contact page on the Plaintiff's website with the Plaintiff's e-mail and telephone. Prior to using the Artist's Biography the Defendants could have contacted the Artist to authenticate any works. The Defendants refuse to accept accountability for violations.

**EXHIBIT D**—Video Page from Artist Annamarie Trombetta's duly documented and dated in 2004 Solo Exhibit "Central to Staten Island at the Staten Island Museum.

**EXHIBIT E**—Entered into evidence is the **Defendant's photo feature** of a signature in Oil Paint on canvas "A . Trombetta"

**EXHIBIT F**-description of the fraudulent painting Man with Red Umbrella signed Annamarie Trombetta

**The signature in the photo which was placed next to my biography creates a false illusion or confusion to anyone that views this signature to appear to belong to Artist Annamarie Trombetta.** Last is the xerox of the description of the fraudulent painting Man(or Woman) with Red Umbrella signed Annamarie Trombetta **EXHIBIT F- as in fraudulent.** As the photo reveals the signature is A. Trombetta not Annamarie Trombetta and it was not by the Plaintiff's/Artist hand nor does it resemble the artist's true signature.

The exhibits and Lanham Act Laws 15 U.S. Code § 1125 and § 1125(a)] False designations of origin, false descriptions, and dilution forbidden 15 U.S.C. § 1051 et seq. validate and exceed the plausible evidence as positive proof of violations to the Plaintiff by the Defendants .

**II. The Visual Artist's Right's Act 17 U.S. Code §106A. Rights of certain authors to attribution and integrity . This is a Federal Law that includes moral rights The Law below states:**

(a)Rights of Attribution and Integrity.—Subject to section 107 and independent of the exclusive rights provided in section 106, the author of a work of visual art—

(1) shall have the right—

(A) to claim authorship of that work, and

(B) to prevent the use of his or her name as the author of any work of visual art which he or she did not create;

Moral rights include:

1. disclosure or divulgation, which allows the artist to determine when a work is complete and may be displayed;
2. **paternity or attribution, which allows an artist to protect the identification of his name with his own work, and to disclaim it when applied to another's;**
3. the right of withdrawal, which permits the artist to modify or withdraw a work following publication; and
4. **integrity, which allows the artist to prevent his work from being displayed in an altered, distorted, or mutilated form.**

**The VARA CLAIM is a clear example of the law and the rights of Artist Annamarie Trombetta to claim damages for the fraudulent and unauthorized use of her name.**

Plaintiff Annamarie Trombetta repeatedly conveyed to all parties that I did not and have not created the sold painting in a phone call that Norb Novicin initiated. At no time did the Plaintiff Annamarie Trombetta ever have contact with Estate Auctions nor did the Plaintiff ever do business with the Defendants prior to the internet posting. The Plaintiff does not know or has not seen the fraudulent Original Oil Painting. Despite the statement there are 12 Photos in the description online—no photos of the painting were visually available. A photo of “A. Trombetta painted in oil on canvas, that is not the Plaintiff’s signature, was the only visual photo image. Again in 2017 Defendant Norb Novicin phoned Plaintiff Annamarie Trombetta to inform the artist that Estate Auction did not have any information on the painting nor could tell the Plaintiff the name of the purchaser of the fraudulent painting. During the conversation the Plaintiff informed the defendant that she did not create the painting and that by selling this painting using the name and biography Annamarie Trombetta was “fraud”. In conclusion, Norb Novicin told the Plaintiff to “Go for It” and to “Hire an Attorney”.

The unauthorized use of the Plaintiff’s name to sell a painting that the Plaintiff did not create is a quintessential example in the purest form of a violation of the Visual Artists Right Act. Further the painting 1972 Original Oil Painting “Man (or Woman) with Red Umbrella in 1972 was not only misappropriated—it was listed / classified and associated with the Plaintiff’s name on the internet via Google-Bing etc. This painting was also described as “Shabby Chic” with two large tears. My name and reputation was associated with a damaged painting that was sold for a small fee of \$181.50 which publicly undervalues the worth of my art my career and reputation .

Lastly on February 19, 2019 at the conference with Judge Ronnie Abrams the mentioning of Anderson Duff’s exemplary case Carter vs. Hemsley- Spear, Inc came up. In the Plaintiff’s case this example is not applicable nor a valid reference for dismissal of the Plaintiff’s VARA claim for the following reasons:

In the case of Carter vs. Hemsley- Spear, Inc **Citation:** 71 F.3d 77 in (1995) the sculptors were “HIRED” to create the artwork The Summary states :

- The right of "integrity" which allows the creator of the work to prevent any deforming or mutilating changes to a work, even after he or she has transferred ownership of the work.
- The right of "attribution" which generally consists of the artist's right to be recognized by name as the author of a work and to prevent creation of the work from being attributed to someone else. This right includes the right to prevent use of the author's name on works created by others, including distorted editions of the author's original work.

The court concluded the artists' sculpture here was **a work made for hire, it was not protected by VARA**. Factors considered in determining whether a work was produced for hire include the artist's right to control the manner and means by which the product was produced, the location of the work, the duration of the relationship between the parties, the method of payment and provision of employee benefits, and the tax treatment of the artist.

**Plaintiff Annamarie Trombetta did NOT create the painting 1972 Original Oil Painting "Man (or Woman) with Red Umbrella in 1972.** The photograph of the signature A. Trombetta was not done by the Plaintiff. Plaintiff's biography was falsely used and secondly the false listing came up on the internet under the Plaintiff's name—and under Artist Annamarie Trombetta. This unlawful action entitles the Plaintiff to Actual and Statutory Damages.

Plaintiff enters into exhibit as VARA Damages the three separate listings on the Internet

**EXHIBIT G** Google listing of Fraudulent painting under the name Annamarie Trombetta. This listing is "1972 Original Oil Painting Man with Red Umbrella Signed Annamarie Trombetta YQZ

**EXHIBIT H** Google listing of Fraudulent painting under Artist Annamarie Trombetta This listing is "1972 Original Oil Painting Man with Red Umbrella Signed Annamarie Trombetta New York Listed Artist **Shabby** Chic Condition. This word and the description profoundly damages my artistic reputation. The Plaintiff asks the court to consider the extent of such a listing and description under the Google Listing for Artist Annamarie Trombetta. This is my career, my business and my livelihood that has been adversely effected.

**The definition of Shabby :** impaired by wear, use, etc.; worn: shabby clothes. showing conspicuous signs of wear or neglect: wearing worn clothes or having a slovenly or unkempt appearance: a shabby person. run-down, seedy, or dilapidated: inferior; not up to par in quality, performance, etc.:

**EXHIBIT I** Google listing of Fraudulent painting in which bonafide listings and links of artist Annamarie Trombetta are associated with this painting that the artist had no involvement.

### III. Copyright Infringement Act

**Copyright infringement is the act of violating any of a copyright owner's exclusive rights granted by the federal Copyright Act. There are three elements that must be in place in order for the infringement to occur.**

The Plaintiff for the convenience of the court listed the Penalties and conditions:



1. The copyright holder must have a valid copyright.
2. The person who is allegedly infringing must have access to the copyrighted work. **(In this case the Defendant had access to the Plaintiff's biography on the artist's website which is on the Internet).**
3. The duplication of the copyrighted work must be outside the exceptions.

The legal penalties for copyright infringement are:

1. Infringer pays the actual dollar amount of damages and profits.
2. The law provides a range from \$200 to \$150,000 for each work infringed.
3. Infringer pays for all attorneys fees and court costs.
4. The Court can issue an injunction to stop the infringing acts.
5. **The Court can impound the illegal works.**
6. **The infringer can go to jail.**

Plaintiff submits a copy of her Certificate of Registration with the United States Copyright Office Records. The Year of Completion is 2003. The Biographical Copyright Infringement took place in the range of years from 2012 to 2015. Subsequent reposting after the Plaintiff contacted worthpoint.com occurred in the middle of 2016 and again into May 2017. The Defendants have not set forth any information regarding the data —photos—origin or provenance of the fraudulent painting that is misappropriated to the Plaintiff. The use of the Plaintiff's unauthorized -detailed and personalized artist's biography without the artist's knowledge or consent is the basis for the copyright infringement claim.

#### **EXHIBIT J Registration Certificate of Annamarie Trombetta's Website # TX-8-655-807.**

Plaintiff submits into evidence the biography of Annamarie Trombetta that was fraudulently used by Estate Auctions in the description for "1972 Original Oil Painting Man with Red Umbrella signed Annamarie Trombetta"

#### **EXHIBIT K Defendant's unauthorized use of Plaintiff's biography.**

The unauthorized use of the Plaintiff's Biography in association with a painting that the artist Annamarie Trombetta did not create constitutes copyright infringement. In the description of "1972 Original Oil Painting Man with Red Umbrella it is stated that there are 12 photos.

The Plaintiff does not know the look or image of the fraudulent painting. The Defendant's Attorney Anderson Duff referenced the infringed copyright case of "Kelly v. L.L. Cool J. 145 F.R.D. 32, 26 (S.D.N.Y. 1992). This fails to be an adequate example at this time as the Defendant has not set forth any imagery despite the fact the Plaintiff requested it and that the description lists 12 photos. The painting is dated 1972. The artist's bio states her formal training began in high school. The visuals are absent. The biography of artist Annamarie Trombetta is verbatim to the Plaintiff's biography on the artist's website. The professional artist Annamarie Trombetta allegations "*made on information and belief*" met the plausibility standard for the Copyright Infringement claim because her general allegations put the Norb and Marie

Novicin and the company Estate Auctions on notice of how it infringed the copyrights, which is enough to survive a 12(b)(6) motion.

#### **IV. New York Consolidated Laws, Arts and Cultural Affairs Law - ACA § 14.03**

**This is a New York State Law.**

1. Except as limited by subdivision three of this section, on and after January first, nineteen hundred eighty-five, **no person other than the artist or a person acting with the artist's consent shall knowingly display in a place accessible to the public or publish a work of fine art or limited edition multiple of not more than three hundred copies by that artist or a reproduction thereof in an altered, defaced, mutilated or modified form if the work is displayed, published or reproduced as being the work of the artist, or under circumstances under which it would reasonably be regarded as being the work of the artist, and damage to the artist's reputation is reasonably likely to result therefrom, except that this section shall not apply to sequential imagery such as that in motion pictures.**

2. (a) Except as limited by subdivision three of this section, the artist shall retain at all times the right to claim authorship, or, for just and valid reason, to disclaim authorship of such work. The right to claim authorship shall include the right of the artist to have his or her name appear on or in connection with such work as the artist. The right to disclaim authorship shall include the right of the artist to prevent his or her name from appearing on or in connection with such work as the artist. Just and valid reason for disclaiming authorship shall include that the work has been altered, defaced, mutilated or modified other than by the artist, without the artist's consent, and damage to the artist's reputation is reasonably likely to result or has resulted therefrom.

(b) The rights created by this subdivision shall exist in addition to any other rights and duties which may now or in the future be applicable.

Plaintiff Annamarie Trombetta has set forth a claim under New York Consolidated Laws Arts and Cultural Affairs Laws § 14.03 for the following reasons:

- 1) This Law is applicable to the artists that reside in the state of New York. VARA is Federal Law and deals with the moral rights of the artists.
- 2) Law § 14.03 number 1 — specifically deals with the right of an artist or any designated artist agent's CONSENT to display in public or published a work of fine art etc as being the work of the artist. The Plaintiff did not consent or know about the public display and use of her name, identity and biography on the internet. This caused "damage" to the artist reputation due to the fact that the artwork described was damaged. This public forum coupled with the fact that the work was deemed "Shabby Chic" on the internet and was sold for below the artist's net worth — lowering the net worth and retail value of the artist in a public platform adds to the loss and damages and substantiates the right to A) Personal Jurisdiction in the State of New York B) New York State's Right to Claim Ownership C) Protects the Artist that resides in New York State with the right of the

artist to have his or her name appear IN PUBLIC on or in connection with such work as the artist.

The rights ACA § 14.03 pertain to New York State Artists and pertain to the **“Right to Publicly display artwork by consent.** None of these rights were respected by the Defendant. All of this rights were violated. Plaintiff petitions the court to include the claims and violations under New York Consolidated Laws, Arts and Cultural Affairs Law.

#### **V. New York Right of Publicity Law Claim § 50 § 51**

Plaintiff can sue for damages for Emotional Distress under the this law. Plaintiff is within the Statutes of Limitation and enters into evidence equalling three forms of Proof.

In January 2017 the Plaintiff contacted Estate Auctions Inc to inform the sellers that I did not create the painting sold and that EA Inc used my biography without my consent. On January 4, 2017 I contacted via e-mail Will Seippel of Worthpoint .com for the second time via e-mail. The re-posting the false sale of 1972 Original Oil Painting Man with Red Umbrella Signed Annamarie Trombetta YQZ and Estate Auctions Inc was reposted twice after the initial take down. The posting was on the internet until spring 2017. This Lawsuit was filed on February 5, 2018. Aside from being within the statutes of limitations Plaintiff also wishes to invoke the Discovery Rule: The discovery rule - the statute of limitations for a cause of action does not begin to run until the time that the injured party discovers or reasonably should have discovered the injury. The False posting was still on the internet after Feb. 5, 2017.

- 1) **EXHIBIT L** Phone call made by Defendant Norb Novicin to Plaintiff on Jan.10, 2017.
- 2) **EXHIBIT M** E-mail to Will Sieppel on January 4, 2017 Solicitation to invest in the company.
- 3) **EXHIBIT N** Third Reposting of Fraudulent painting in 2017 which led to this lawsuit.

**§ 50** A person, firm or corporation that uses for advertising purposes, or for the purposes of trade, the name, portrait or picture of any living person without having first obtained the written consent of such person, or if a minor of his or her parent or guardian, **is guilty of a misdemeanor.**

**§ 51 To violate § 51, a use of a person's identity must be:**

- Within New York state;
- For advertising or trade purposes; and
- Without written consent.

The focus on advertising and trade means that a use designed to solicit sales of products or services is forbidden. But this category of advertising uses is somewhat narrow; § 51 contains a long list of exceptions to the right of publicity, which include protections for:

- professional photographers against suits by their subjects;
- the use of an author's name, in connection with the work of that author;
- owners of copyrights in sound recordings; and



- using a person's identity in connection with products, if the person manufactured or sold those products under their identity.

**Damages** — Section 51 provides for both injunctive relief and compensatory damages. A plaintiff can seek an injunction against continued use of her identity, and can recover monetary damages to compensate for the harm caused by past uses. The damage award primarily compensates for emotional distress. See *Garis v. Uncut-RawTV*, No. CV 06–5031, 2011 WL 4404035, at \*3-4 (E.D.N.Y. July 5, 2011).

Section 51 also provides for punitive or exemplary damages, if certain conditions are met. A plaintiff can recover exemplary damages if the defendant knew that the plaintiff had not consented to the use of her identity. *Id.* at 4-5. Courts may award exemplary damages if necessary to deter future violations of Section 51.

### **PLAINTIFF SUBMITS INTO EVIDENCE INFORMATION REFLECTING THE CHARACTER OF THE DEFENDANTS AND THE DEFENDANT’S ATTORNEY ANDERSON DUFF.**

The Plaintiff once again must inform the court that Plaintiff has NOT requested or solicited the following information. This information/evidence reflects the character and conduct of the Defendants Norb and Marie Novicin and Estate Auctions Inc.

**EXHIBIT O** Mail From Delaware Bankruptcy Court Case # 19-10056-BLS—Filing for Ch 7 bankruptcy by Norbert William Novicin Jr. and Marie Ellen Novocin on January 9, 2019

**EXHIBIT P** E-mail from Henry Weller who phoned the Plaintiff on August 11, 2018 at 6 a.m. Submitted was the e-mail documents of Anderson Duff’s attempted Burglary charge.

**EXHIBIT Q** Delaware Business Times May 24, 2018 Article stating “The Seaford-based company has eight employees and generates up \$1 million in sales per year”. Exhibit O is from January 2019 filing for bankruptcy. This is quite a strong contradiction in a period of nine months.

**EXHIBIT R** Posting by Wendy Maritnez dated December 6, 2016 on Estate Auctions Inc Facebook page —Counterfeit Item listed as French porcelain by EA INC. which is from China. This is another example outside of the Plaintiff’s claim that reveals a false posting.

In addition I will also state that the actions by the Novicins constitutes Identity Theft. When this began Plaintiff was advised by the NYPD to close out all credit cards etc. which caused the Plaintiff a great deal of work and inconvenience. In essence this was a form of Identity theft. This is a criminal action that the Plaintiff has the right to report . Please read definition below:

#### **I-den-ti-ty theft**

noun: **identity theft**; plural noun: **identity thefts**

1. the fraudulent acquisition and use of a person's private identifying information, usually for financial gain.
2. **Identity theft** and **identity fraud** are terms used to refer to all **types of crime** in which someone wrongfully obtains and uses another person's personal data in some way that involves **fraud** or deception, typically for economic gain.

**Laws 1.** 18 U.S. Code § 1028. Fraud and related activity in connection with identification documents, authentication features, and information (a) Whoever, in a circumstance described in subsection (c) of this section 1) knowingly and without lawful authority produces an identification document, or a false identification document; (2) knowingly transfers an identification document, authentication feature, or a false identification document knowing that such document or feature was stolen or produced without lawful authority; 2. Under the Identity Theft and Assumption Deterrence Act, it is a federal crime when a person "knowingly transfers or uses, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, any unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law."

Plaintiff has endured for about four years the ordeal of fraudulent information removed and reposted on the internet. Every civilized and reasonable attempt to free the Plaintiff of this fraudulent posting —painting and purchase has caused a great deal of loss—frustration and insult to the Plaintiff. The signature of the artist on their painting increases the value of the work. Without the signature there is no authenticity to the artwork. To have my reputation associated with another unknown signature has caused my branding, my identity and my reputation to be severely compromised. The Defendants unacknowledged these facts which may indicate that they are susceptible to do it again; hence one of the reasons for this lawsuit.

Lastly this lawsuit and this submission holds valuable information to all artists, photographers, writers and the like that are sole proprietors vulnerable to misappropriation of their work. I sincerely hope this information can assist other should they find themselves in an unwanted litigation suit.

The Plaintiff in the hope of a resolution offers the Settlement terms before the Defendants and The Honorable Judge Ronnie Abrams for review as a means to end this legal matter.

### **Settlement Offer from Plaintiff Annamarie Trombetta**

The Plaintiff had a conditional offer A) The Plaintiff Requests the amount of \$70,000 to settle this case. If the Defendants can submit all the information —documents —photos and statements that were duly documented prior to this law suit and settlement —

-The Plaintiff agrees to deduct the amount by each article of information that is supplied by the Defendant's Norb Novicin and Marie Novicin—Estate Auctions Inc

The Requested Articles —Documented Statements are as follows

1. Submission of the 12 photographs duly written on the internet of the Actual Original Oil Painting Entitled Man (or Woman ) with the Red Umbrella.
2. The Name —Address —and Contact Phone Number of the Actual Owner of the painting. Notification Letter to the purchaser from Estate Auctions informing them that Artist Annamarie Trombetta is not the creator of this painting.
3. A photograph of the actual signature in Red described on the back of the painting.
4. Photographs of the tears or torn canvas in the description of the painting.

5. The Name and Address and a statement from the of the Lawyer that the Novicins consulted with regarding the Settlement Letter sent by the Law Firm of Cahill Partners on behalf of the Plaintiff Annamarie Trombetta
6. The Letter Settlement Letter sent by Megan Noh of Cahill Partners Inc.
7. A copy of the response letter by Marie Novicin to the Better Business Bureau
8. A written confirmation that all internal records and any publicly accessible data including website metadata in regard to the sale of this painting have been corrected and removed.
9. If possible a copy of the Defendant's 2012 Income taxes that reported the sale of the painting.
10. An explanation and or statement as to WHY the painting was sold in 2012 and is devoid of any proof still on the internet in 2015.

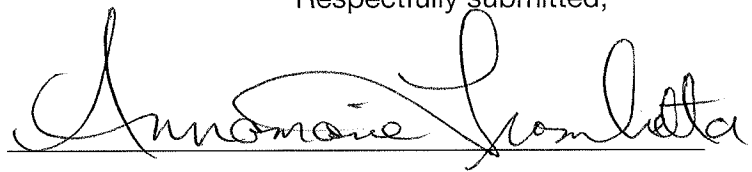
For each piece of Proof that is entered by the Defendants and or their attorneys the Plaintiff will lower the amount of the settlement.

I enter into the court documents for Case No.18-CV-0093-RA-HBP Trombetta Vs. Norb

Novicin —Marie Novicin—Estate Auctions the information pertinent to the validity, violations and infringements set upon the Plaintiff.

Plaintiff Annamarie Trombetta wishes to thank the court for their consideration, time and effort pertaining to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Annamarie Trombetta', written over a horizontal line.

April 23, 2019

Annamarie Trombetta

Plaintiff , Pro se` Litigant

175 East 96th Street

New York , New York 10128

Anderson J. Duff

244 Fifth Avenue Stue 2230

New York, New York 11101

# EXHIBITS

**EXHIBIT A** -Home Page Website with copyright symbol and statement All rights reserved by Annamarie Trombetta .

**EXHIBIT B**— Biography Page —Estate Auction copied verbatim the first half of my biography.

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**EXHIBIT H** Google listing of Fraudulent painting under Artist Annamarie Trombetta This listing is "1972 Original Oil Painting Man with Red Umbrella Signed Annamarie Trombetta New York Listed Artist **Shabby** Chic Condition.

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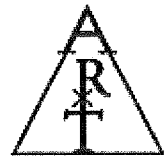
**EXHIBIT P** E-mail from Henry Weller who phoned the Plaintiff on August 11, 2018 at 6 a.m. Submitted was the content of the e-mail with attachments of Attorney Anderson Duff's

**EXHIBIT Q** Delaware Business Times May 24, 2018 Article stating “The Seaford-based company has eight employees and generates up \$1 million in sales per year”. Exhibit O is from January 2019 filing for bankruptcy. This is quite a strong contradiction in a period of nine months.

**EXHIBIT R** Posting by Wendy Maritnez dated December 6, 2016 on Estate Auctions Inc Facebook page —Counterfeit Item listed as French porcelain by EA INC. which is from China.



# Annamarie Trombetta



HOME



PORTFOLIO



VIDEO

ARTIST  
INFO

BIOGRAPHY



CREDENTIALS

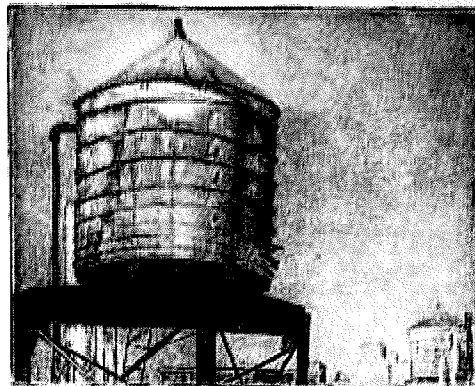


CONTACT



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# Annamarie Trombetta



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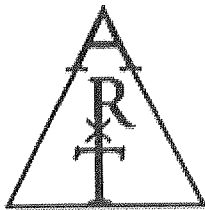


CONTACT



## Biography

## Exhibit B



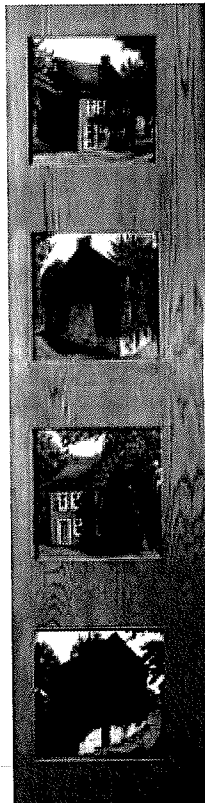
The nature of an artist's life, creativity and growth may be synonymously expressed in the image of an archetypal tree. Beginning with the earthly descendent roots the artist like the tree branches out into its surrounding environmental and celestial world. Both ascend and descend, widening their girth of consciousness while producing visual imagery, weathering each season of change. Thus, I believe it is the nature of the artist and of nature itself to regenerate and manifest. All of the imagery in this catalog (tba) was either created en plein air or from the subject directly.

My journey to becoming an artist began many years ago. The consanguineous roots of my Italian family tree provided me with an innate constitution for my artistic profession. When I was a tiny seed of contemplative thought, my artistic nature began to sprout interest while gazing up at the ceiling paintings in a neighborhood church named Regina Pacis, meaning Queen of Peace. The church located in Brooklyn, NY features ceiling paintings, sculptures, marble interiors, and incorporates architectural elements for the facade and the belfry that are of Italianate design. Before the age of three I was able to surmise that the church in the ceiling painting was indeed the church I was in. The visual stimulation was a form of education. It fostered my sense of perception which became my strongest mode for acquiring knowledge.

As the years unfurled, my family moved to Staten Island. At this time it was a scenic field of luminosity, lush vegetation and a harbor view complete with sail boats and small yachts. A few years after we moved my tree of life was in jeopardy of losing a limb. What appeared to be a swollen leg was indeed a cancerous tumor. It was an almost fatal or perhaps even a fated occurrence in my life. The struggle to survive the experience was lightened by my imagination and by my artistic ability to create. I seriously thought I would go into medicine but the posters and paintings in the hospital and doctor's office held my attention more intensely.

I began my formal training at The Brooklyn Museum School of Art while I was in high school. The exposure to various forms of art inspired me to expand my horizons and in the early Eighties I traveled on a summer tour to Europe. The tour comprised of six countries; Germany, Austria, France, Italy, Switzerland and England. Viewing so many different cities and cultures in a concentrated period of time helped me to see the similarities as well as the differences of each quite clearly.

Upon my return I enrolled in an art history course to examine the content of art in relation to its chronological, political and historical relevance while applying to art colleges. I was accepted to Parsons School of Design located in lower Manhattan. The pulsating pace of this compressed cosmopolitan city was reflected in the school's curriculum. Although I did enjoy the challenges and experiences which expanded my capabilities, I was not satisfied with the level of my drawing and painting skills. In the



elaborates on his immortal words. To learn about his family, his life and his vision motivated me to begin a new chapter in creating my own work.

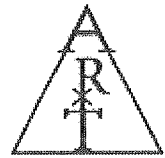
To culminate my journey, when I returned home I gathered the metaphorical leaves and branches that had fallen from my artistic tree, be it ancestral or archetypal and concentrated solely on 'The Holy Tree' described in Yeats's poem "The Two Trees." This image, inspired by the milieu of a mentor miles away is a tribute to his gifts and determined ways which regenerated and awakened the visionary in me. This upcoming catalogue highlights the pictorial progression from that trip and the time that followed.

I wish to acknowledge certain individuals who have enhanced my artistic sensibilities as a person, as well as an artist. These individuals include Everett Raymond Kinstler, Raymond Steiner, Harvey Dinnerstein, Burton Silverman, the artist's in The Painting Group particularly Aaron Shikler, David Levine, Danny Schwartz, Irene Hecht. I thank them for their help and guidance in my life.

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# Annamarie Trombetta



[HOME](#)
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## Exhibit C

## Contact

I can be reached by phone at (212) 427-5990 or you can e-mail me either with the form below or at [annamarie@trombettaart.com](mailto:annamarie@trombettaart.com). If you are interested, you can also join my [mailing list](#).

My E-mail address is

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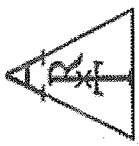


Exhibit D

Annamarie Trombetta

HOME



PORTFOLIO



VIDEO



ARTIST  
INFO



BIOGRAPHY



CREDENTIALS



CONTACT



## Plein Air Painting, 2004

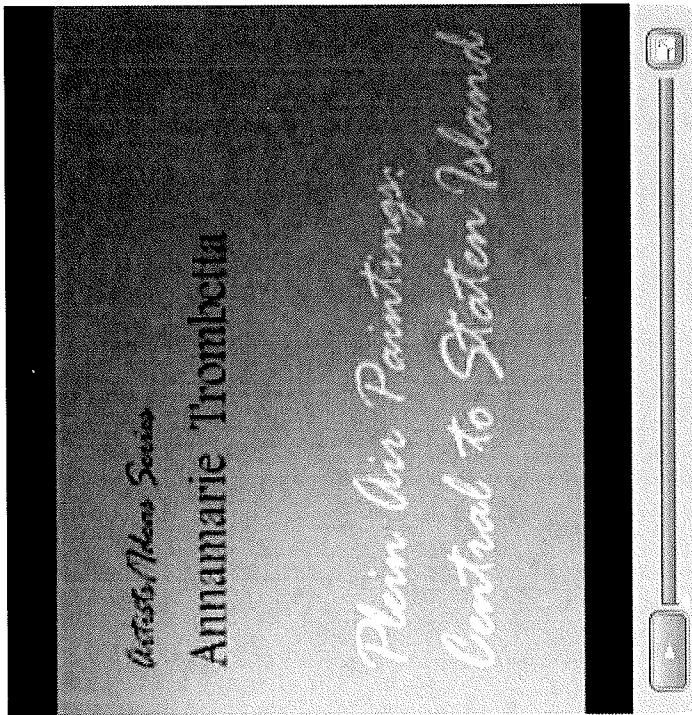
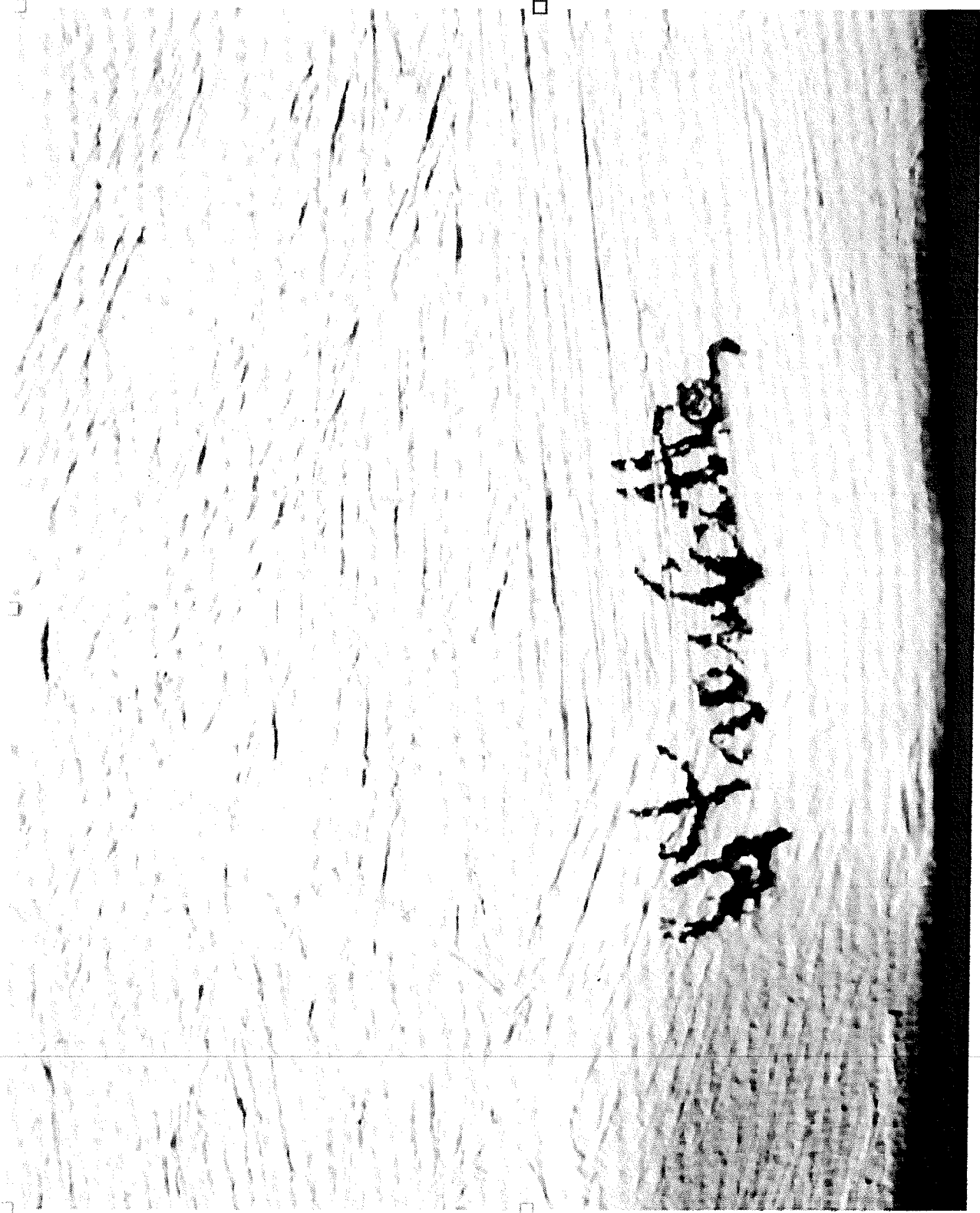
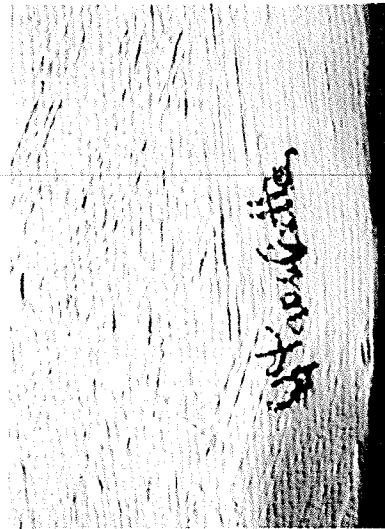




Exhibit E





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1972 ORIGINAL OIL PAINTING MAN WITH RED UMBRELLA SIGNED ANNAMARIO TROMBETTA YQZ

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SOURCE: eBay

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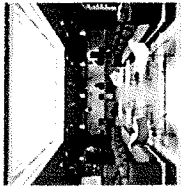
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https://paddle8.com/artists/annamarie-trombetta/  
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salem kriegler on Twitter: "Painting Central, a short video ...  
https://twitter.com/salemk/status/269681283083403264  
... @salemk 16 Nov 2012. Painting Central, a short video about Annamarie Trombetta a  
painter working in Central Park, NYC.. http://vimeo.com/52924850 ...  
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Annamarie Trombetta attends the Sing for Hope pop up ...  
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Annamarie Trombetta attends the Sing for Hope pop up pianos launch at the Sing For  
Hope Piano Warehouse on June 7, 2011 in New York City. Get premium ...

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https://www.flickr.com/people/annamarietrombettaart/  
Annamarie Trombetta hasn't listed any contacts yet. Testimonials (0). Annamarie  
Trombetta doesn't have any testimonials yet. Name: Annamarie Trombetta.

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UP IN THIS AUCTION <<<<< 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta New York Listed Artist - Shabby Chic Condition. You've visited this page many times. Last visit: 1/5/16

## Central Park's Plein Air Past | OutdoorPainter

[www.outdoorpainter.com/central-park-s-plein-air-past/](http://www.outdoorpainter.com/central-park-s-plein-air-past/) ▾

"The Destructive Dance of 'Sandy,'" by Annamarie Trombetta ... Finding out about all this history, and the connections generated by artists, gave me a mission. You've visited this page many times. Last visit: 12/13/15

## Annamarie M Trombetta - Intelius

[www.intelius.com/people/Annamarie-Trombetta/0csdtac91wf](http://www.intelius.com/people/Annamarie-Trombetta/0csdtac91wf) ▾

Annamarie M Trombetta's Pic Annamarie M Trombetta. Annamarie M Trombetta Sagittarius Zodiac SignSagittarius. Annamarie M Trombetta Instructor at Art Lab.

## Annamarie Trombetta on Paddle8

<https://paddle8.com/artists/annamarie-trombetta/> ▾

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## Annamarie Trombetta - Address, Phone Number, Public ...

[radaris.com/p/Annamarie/Trombetta/](http://radaris.com/p/Annamarie/Trombetta/)

trombettaart.com The Process of Printmaking reveals some of the steps taken in order to create an intaglio etching. The artist Annamarie Trombetta has made a ...

## Artist Annamarie Trombetta working on her piano, which ...

<https://www.pinterest.com/pin/177751516514603960/> Pinterest

Artist Annamarie Trombetta working on her piano, which commemorates the 10- year anniversary of 9/11. | See more about Piano, Anniversaries and Artists.

## Video - Salem Krieger

[www.newyork-portrait-photography.com/gallery.html?gallery=Video](http://www.newyork-portrait-photography.com/gallery.html?gallery=Video)

Painting Central - artist Annamarie Trombetta. Painter Donald Vaccino. Study #1 Daily Chores. Bissel Gardens - Organic Community Garden - Bronx, NY ...

## CBS New York » Annamarie Trombetta

[newyork.cbslocal.com/tag/annamarie-trombetta/feed/](http://newyork.cbslocal.com/tag/annamarie-trombetta/feed/) WCBS-TV

Jun 7, 2011 - "To me, it sums up what music is about, what art is about, which is pulling ... Annamarie Trombetta works on her design for a public piano - New ...

## NOIAW Wishes Everyone Happy Holidays -- December ...

[www.noiaw.org/.../noiaw-wishes-everyone-happy-holidays-december-ne...](http://www.noiaw.org/.../noiaw-wishes-everyone-happy-holidays-december-ne...) ▾

Jan 9, 2015 - NOIAW member and artist, Annamarie Trombetta, will be featured in an upcoming exhibition at the Union League Club in New York City from ...

## Annamarie Trombetta - artist - Marquis Who's Who Biography

[bios.marquiswhoswho.com/annamarie\\_trombetta/artist/3976399](http://bios.marquiswhoswho.com/annamarie_trombetta/artist/3976399) ▾

New York NY Artist

Marquis Who's Who Biography for Annamarie Trombetta, artist.

First

Exhibit

H





1972 Original Oil Painting Man with Red umbrella signed Annamarie Trombetta



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Annamarie Trombetta - Artist Info

www.trombettaart.com/info.html ▼

2001, -Richmondtown Historic Museum, S.I, NY "Plein Air Paintings of Staten ... representation may be, Annamarie Trombetta is enough of an artist to realize that ... Missing 1972 oil man red umbrella

Annamarie Trombetta, Artist Interviewed by June Middleton ...



https://www.youtube.com/watch?v=ufEQ3D3LWms

Apr 29 2015 Uploaded by JuneMindingBusiness

Annamarie Trombetta, an artist who's art has been exhibited around the world, has created works in oil ...

Missing 1972 oil man red umbrella

Painting Central - artist Annamarie Trombetta on Vimeo



vimeo.com › salem kriegler › Videos Vimeo

Nov 6 2012

Artist Annamarie Trombetta a NYC based painter working in Central Pak. A profile of Annamarie as an artist.

Missing 1972 oil man red umbrella

Central Park's Plein Air Past | OutdoorPainter

www.outdoorpainter.com/central-park-s-plein-air-past/ ▼

So it's perfectly natural that plein air painting would go on in those choice ... "The Destructive Dance of 'Sandy,'" by Annamarie Trombetta ... "Central Park Clockwork Mode of Multicolored Apps," by Annamarie Trombetta, oil and mixed media.

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*Kary A. Lush*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-655-807**

Effective Date of Registration:

June 18, 2018

## Title

Title of Work: Annamarie Trombetta Website [www.trombettaart.com](http://www.trombettaart.com) Biography --Portfolio-Credentials -- HomePage

## Completion/Publication

Year of Completion: 2003  
Date of 1st Publication: September 30, 2003  
Nation of 1st Publication: United States

## Author

- Author: Annamarie Trombetta
- Author Created: text, photograph(s), artwork
- Citizen of: United States
- Domiciled in: United States
- Year Born: 1963

## Copyright Claimant

Copyright Claimant: Annamarie Trombetta  
175 East 96th Street (12R), New York, NY, 10128, United States

## Certification

Name: Annamarie Trombetta  
Date: June 18, 2018

Correspondence: Yes

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## 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz

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- Item Category: -
- Source: [eBay](#)
- Sold Date: Dec 01, 2012
- Channel: Online Auction

Exhibit R

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>>>>> UP IN THIS AUCTION <<<<< 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta New York Listed Artist - Shabby Chic Condition

- DESCRIPTION - Please be patient there are 12 photos to be loaded in this auction. Up in this auction is a wonderful and delightful oil on canvas painting of a man (I guess it could be a woman) with a red umbrella. This is by Annamarie Trombetta. It is signed on the bottom, but on the back it has written in red on the stretcher, Annamarie Trombetta "Gifted" 1977, "Painted" 1972. To our eyes it looks like it is after the style of Andre Kohn. It is quite large being approx. 48 1/2" tall and 17 1/2" wide. We are calling it shabby chic condition as it has a tear in the canvas, about 5/8" long just to the left of the man's knees, but still such a great painting. For those not familiar with Trombetta, here is information about her from off AskArt as they got it from her website: Annamarie Trombetta (1963 - ) Lived/Active: New York The nature of an artist's life, creativity and growth may be synonymously expressed in the image of an archetypal tree. Beginning with the earthly descendent roots the artist like the tree branches out into its surrounding environmental and celestial world. Both ascend and descend, widening their girth of consciousness while producing visual imagery, weathering each season of change. Thus, I believe it is the nature of the artist and of nature itself to regenerate and manifest. All of the imagery in this catalog was either created en plein air or from the subject directly. My journey to becoming an artist began many years ago. The consanguineous roots of my Italian family tree provided me with an innate constitution for my artistic profession. When I was a tiny seed of contemplative thought, my artistic nature began to sprout interest while gazing up at the ceiling paintings in a neighborhood church named Regina Pacis, meaning Queen of Peace. The church located in Brooklyn, NY features ceiling paintings, sculptures, marble interiors, and incorporates architectural elements for the façade and the belfry that are of Italianate design. Before the age of three I was able to surmise that the church in the ceiling painting was indeed the church I was in. The visual stimulation was a form of education. It fostered my sense of perception which became my strongest mode for acquiring knowledge. As the years unfurled, my family moved to Staten Island. At this time it was a scenic field of luminosity, lush vegetation and a harbor view complete with sail boats and small yachts. A few years after we moved my tree of life was in jeopardy of losing a limb. What appeared to

1972 Original

broken swollen leg was indeed a cancerous tumor. It was an almost fatal or perhaps even a fated occurrence in my life. The struggle to survive the experience was lightened by my imagination and by my artistic ability to create. I seriously thought I would go into medicine but the posters and paintings in the hospital and doctor's office held my attention more intensely. I began my formal training at The Brooklyn Museum School of Art while I was in high school. The exposure to various forms of art inspired me to expand my horizons and in the early Eighties I traveled on a summer tour to Europe. The tour comprised of six countries; Germany, Austria, France, Italy, Switzerland and England. Viewing so many different cities and cultures in a concentrated period of time...

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**Subject:** Marilyn Monroe 1988 Vintage Michael Ochs Archive Chanel Perfume ... www.worthpoint.com > Worthopedia™-----Artist Annamarie Trombetta

**From:** Annamarie Trombetta (trombettaart@yahoo.com)

**To:** will@worthpoint.com;

**Date:** Wednesday, January 4, 2017 11:28 AM

Exhibit M

Mr. Sieppel,

Please allow me to Re-introduce myself. My name is Annamarie Trombetta. I am an artist . Last year I found a MISATTRIBUTION of a painting that I did NOT create on your website--Worthpoint.com which came up on the internet under my name. Specific personal content from my professional biography on my personal artist website was copied, transplanted and posted on your site. A picture of a painted signature on canvas signed A. Trombetta that was NOT MY signature was also photo featured on the Worthpoint.com website listing.

On February 20, 2016 I contacted you via e-mail. Prior to contacting you I had spoken several times with your employer Anita and eventually I was on the phone at length with your webmaster Mr. Gregory Watkins regarding the FRAUDULENT posting of a painting that I did not create. I requested that this Fraudulent listing be permanently removed. I also sent a notice to the company website. SEE BELOW

## **Ticket #57565: Artist Annamarie Trombetta----Fraudulent Artwork--and links to Fraudulent Artwork**

**WorthPoint** | Feb 20, 2016 10:24AM EST

Thank you for submitting your request. We have received your request and are working on responding to you as soon as possible. If you have any additional information to add to this case, please reply to this email.

Thanks in advance for your patience and support.

This message was sent to trombettaart@yahoo.com in reference to Case #57565.

[[7e0d850a2b9039a31cbf23ab9ae58ea3fc4a46c9-641

I am contacting you once again almost a year later because I found yet again a listing from Worthpoint.com under my name--Annamarie Trombetta artist. Below is today's listing January 4th 2017 of subjects and site which come up when I Google Annamarie Trombetta artist. PLEASE REVIEW --- The Marilyn Monroe listing was the first place where my name was Falsely associated along with the fraudulent painting and signature attributed to me that was listed on Worthpoint.com.

A year ago I took time, energy and effort to contact you and your company regarding the false attribution and requested that it should be removed. I have NEVER HAD ANY ASSOCIATION with WORTHPOINT.com---NOR have I ever had any business with Worthpoint.com and yet in a Google

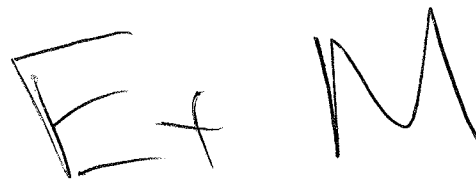


search for Annamarie Trombetta Artist your company is listed under my name. **This listing is not authentic and has NO RIGHT TO BE LISTED UNDER MY NAME.** The Listing from Worthpoint.com is taking up space that should be for my other **TRUE** credentials ---and should not **BE OCCUPIED** by your company.

I am requesting that you remove this **IMMEDIATELY** from the internet -- kindly contact Google and responsibly deal with this issue to bring about a **PERMANENT ENDING**. I do **NOT WISH TO BE ASSOCIATED** with your company---in **ANY WAY**. The numerous times that I have had to contact you regarding this issue is an outrage and a waste of my personal time. This is costing me time, effort and energy needlessly and for **NO LOGICAL REASON** as **AGAIN** I have contacted your company numerous times.

I am requesting a written response to this e-mail as soon as possible as a confirmation for receipt of this e-mail. Further, I am requesting that you and your company **PERMANENTLY** remove the association --or connection that Google or the algorithms on any other internet site thereof have between your company ---Worthpoint.com---- and my name Annamarie Trombetta.

Sincerely,  
Annamarie Trombetta

A handwritten signature consisting of the letters 'E' and 'M' joined by a plus sign '+'. The 'E' is formed with three horizontal strokes and a vertical one on the left. The '+' is a simple cross. The 'M' is formed with two vertical strokes and a central 'W' shape.

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**Fw: Suzanne A. Wells, the eBay Selling Coach,  
partners with WorthPoint!**

Thursday, October 27, 2016 1:08 PM

**From:** "Annamarie Trombetta" <trombettaart@yahoo.com>**To:** "Annamarie Trombetta" <trombettaart@yahoo.com>

Full Headers Printable View

To protect your privacy, Yahoo Mail has blocked remote images in this message. Show Images

----- Forwarded Message -----

**From:** WorthPoint <equity@worthpoint.com>**To:** trombettaart@yahoo.com**Sent:** Thursday, October 27, 2016 10:40 AM**Subject:** Suzanne A. Wells, the eBay Selling Coach, partners with WorthPoint!

WorthPoint Update

[View this email in your browser](#)

Exhibit M

Hello,

WorthPoint is thrilled to welcome Suzanne A. Wells to the WorthPoint community. The veteran eBay selling coach and blogger has partnered with WorthPoint in the mammoth task of listing and selling WorthPoint CEO Will Seippel's personal collection on eBay. Will's eBay store currently lists almost 4000 items, with another 100,000 to be added -- Suzanne estimates this will keep her busy through 2017.

With over a decade of experience, Suzanne has made a career of selling on eBay and teaching others this valuable skill. She is a trusted resource and influencer in the eBay community as well as a writer on blogs and websites. She has built a loyal following of at-home eBay sellers who visit her sites for advice, motivation, and understanding of how to make money on one of the world's largest marketplaces.

Suzanne discusses the downsizing on her blog [here](#), and if you'd like to follow along, she is documenting the grand adventure from start to finish in her Youtube channel [here](#).

As any picker, collector, or seller knows, having up-to-date, first-hand access to pricing information is key to a successful business or hobby -- WorthPoint offers exactly that.

WorthPoint plans to invite the public to become shareholders in the company. To learn more about this upcoming investment opportunity and to express your interest to invest, click the button below.

INDICATE INTEREST

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daily deals  
— up to —  
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Investment

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artofannamaria@gmail.com

Google

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second

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first

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THOMAS KINKADE -KINCAID - WorthPoint  
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Sold for: Start Free Trial or Sign In to see what it's worth. ... 1972 Original Oil Painting Man With Red Umbrella Signed Annamaria Trombetta yqz - Handmade New Mexican Folk Art Church Birdhouse LARGE Lark Sedona BLUE HELLO KITTY ...

third

1789 bonnaterre original antique hand colored reptile ...  
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### Annamarie Trombetta - Biography

www.trombettaart.com/bio.html  
When I was a tiny seed of contemplative thought, my artistic nature began to sprout interest while gazing up at the ceiling paintings in a neighborhood church ...  
Missing: 1972 oil man red umbrella yqz

### Annamarie Trombetta - Artist Info

www.trombettaart.com/info.html  
EDUCATION 1999 - National Academy School of Fine Arts 1991 - William Butler Yeats Summer School, Sligo, Ireland 1989 - New York Academy of Art 1987 - Art ...  
Missing: 1972 oil man red umbrella yqz  
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artist annamaria trombetta's imagery offers visionary ...

italianamericanmuseum.org/news/news\_plein.html  
Artist Annamaria Trombetta's "Central Park Imagery," a collection of en plein air ... Ms. Trombetta is an artist who has created works in printmaking, watercolor, oil ... The New York Academy of Art, The National Academy Museum and School, ...  
Missing: 1972 man red umbrella yqz  
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Annamarie Trombetta, Artist Interviewed by June Middleton ...

https://www.youtube.com/watch?v=ufEQ3D3LWms  
Apr 29, 2015 - Uploaded by JuneMindingBusiness  
Annamarie Trombetta, an artist who's art has been exhibited around the world, has created works in oil ...  
Missing: 1972 man red umbrella yqz

Painting Central - artist Annamaria Trombetta on Vimeo



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4.7 ★★★★★ rating for saatchiart.com  
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www.montclairartmuseum.org/  
(973) 746-5555  
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35 Wooster St, New York, NY

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Exhibit

**Information to identify the case:**

Debtor 1 **Norbert William Novocin Jr.**  
 First Name Middle Name Last Name

Debtor 2 **Marie Ellen Novocin**  
 (Spouse, if filing) First Name Middle Name Last Name

Social Security number or ITI

EIN \_\_\_\_\_

Social Security number or ITI

EIN \_\_\_\_\_

United States Bankruptcy Court **District of Delaware**Case number: **19-10056-BLS**Date case filed for chapter **7** **1/8/19****Official Form 309A (For Individuals or Joint Debtors)****Notice of Chapter 7 Bankruptcy Case -- No Proof of Claim Deadline**

12/17

For the debtors listed above, a case has been filed under chapter 7 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

The debtors are seeking a discharge. Creditors who assert that the debtors are not entitled to a discharge of any debts or who want to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadlines specified in this notice. (See line 9 for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at [www.pacer.gov](http://www.pacer.gov)).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

Debtors: Valid Picture ID is required for access to the J. Caleb Boggs Federal Building. Additionally, Debtor(s) must also present photo ID plus original verification of his/her social security number to the Bankruptcy Trustee. If you do not have a photo ID and/or original verification of your social security number, please contact the Office of the United States Trustee's (302-573-6491).

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	Norbert William Novocin Jr.	Marie Ellen Novocin
2. All other names used in the last 8 years	aka Norb Novocin	
3. Address	12221 Old Furnace Rd Seaford, DE 19973	12221 Old Furnace Rd Seaford, DE 19973
4. Debtor's attorney Name and address	James C. Reed James C. Reed, P.A. 6 Century Plaza 19633 Blue Bird Lane, Suite 6 Rehoboth Beach, DE 19971-6130	Contact phone 302-227-2477 Email: jamescreed@verizon.net
5. Bankruptcy trustee Name and address	George L. Miller 1628 John F. Kennedy Blvd. Suite 950 Philadelphia, PA 19103-2110	Contact phone 215-561-0950 Email: gmiller@mctllp.com

For more information, see page 2 &gt;

**6. Bankruptcy clerk's office**

824 Market Street, 3rd Floor  
Wilmington, DE 19801

Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at [www.pacer.gov](http://www.pacer.gov).

Hours open: Monday – Friday 8:00 AM – 4:00 PM

Contact phone 302-252-2900

Date: 1/9/19

**7. Meeting of creditors**

**February 1, 2019 at 09:00 AM**

Debtors must attend the meeting to be questioned under oath. In a joint case, both spouses must attend. Creditors may attend, but are not required to do so.

The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

Location:

**844 King Street, Room 3209,  
Wilmington, DE 19801**

**8. Presumption of abuse**

The presumption of abuse does not arise.

If the presumption of abuse arises, you may have the right to file a motion to dismiss the case under 11 U.S.C. § 707(b). Debtors may rebut the presumption by showing special circumstances.

**9. Deadlines**

The bankruptcy clerk's office must receive these documents and any required filing fee by the following deadlines.

**File by the deadline to object to discharge or to challenge whether certain debts are dischargeable:**

**Filing deadline: 4/2/19**

**You must file a complaint:**

- if you assert that the debtor is not entitled to receive a discharge of any debts under any of the subdivisions of 11 U.S.C. § 727(a)(2) through (7), or
- if you want to have a debt excepted from discharge under 11 U.S.C § 523(a)(2), (4), or (6).

**You must file a motion:**

- if you assert that the discharge should be denied under § 727(a)(8) or (9).

**Deadline to object to exemptions:**

The law permits debtors to keep certain property as exempt. If you believe that the law does not authorize an exemption claimed, you may file an objection.

**Filing deadline:** 28 days after the conclusion of the meeting of creditors

**10. Proof of claim**

Please do not file a proof of claim unless you receive a notice to do so.

No property appears to be available to pay creditors. Therefore, please do not file a proof of claim now. If it later appears that assets are available to pay creditors, the clerk will send you another notice telling you that you may file a proof of claim and stating the deadline.

**11. Creditors with a foreign address**

If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

**12. Exempt property**

The law allows debtors to keep certain property as exempt. Fully exempt property will not be sold and distributed to creditors. Debtors must file a list of property claimed as exempt. You may inspect that list at the bankruptcy clerk's office or online at [www.pacer.gov](http://www.pacer.gov). If you believe that the law does not authorize an exemption that the debtors claim, you may file an objection. The bankruptcy clerk's office must receive the objection by the deadline to object to exemptions in line 9.



Exhibit  
D

2/18/2019

Gmail - Anderson Duff - Criminal



Annamarie Trombetta &lt;artofannamarie@gmail.com&gt;

**Anderson Duff - Criminal**

5 messages

**Henry Wellers** <henry.wellers1982@gmail.com>  
 To: annamarie@trombettaart.com

Sat, Aug 11, 2018 at 7:06 AM

Hi Annamarie,

Nice talking earlier. And again, I apologize if I caught you at a bad time.

I decided to call you to give you some insider tips on Anderson and his criminal conduct.

Here is the juice.

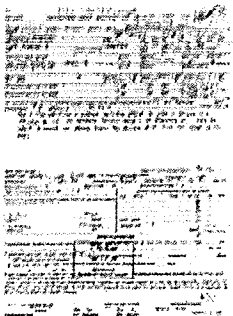
- 1) [pssweb.com/InmateBooking/SubjectResults.aspx?id=1282078](https://www.pssweb.com/InmateBooking/SubjectResults.aspx?id=1282078)
- 2) <https://eemspa.pinellascounty.org/PublicAccess/default.aspx> - Do a search under 'all case records' and search for Anderson Duff
- 3) Please see attached document. It says he broke and enter Northside Christian School in Florida with intent to commit burglary.

As you can see, they all say Anderson Josiah Duff and all in Florida - just where Anderson grew up and did undergrad

Please show this to a judge. A lawyer who has been prosecuted for a felony burglary is basically dead. His credibility will be destroyed in front of the conservative judges. He probably lied to gain admission to the NY Bar.

I hope this helps.

Henry



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 104K

## Pinellas County Sheriff's Office Subject Charge Report

The data on this site provides arrest and booking information and should not be relied upon to determine an individual's actual criminal record. This data may not reflect charging decisions made by the State Attorney's Office or the outcome of criminal trials. An acquittal or dismissal of a criminal charge does not necessarily negate the validity of an arrest. To obtain the final disposition of any criminal charges, contact the Clerk of the Court's Office.

Name	Docket No.	Booking Date	Arresting Agency	
DUFF, ANDERSON J	1282078	12/23/2007 6:13:21 AM	PINELLAS COUNTY SHERIFF	
Address	City	State	Zip Code	
122 NORTH HAYFORD AVE	LANSING	MI	48912	
Race	Sex	DOB	Place of Birth	Arrest Age
WHITE	MALE	6/7/1982	OH	25
Eyes	Hair	Complexion	Height	Weight
BLU	BLN		600	170

Scars, Marks & Tattoos

Cell Location/Status	Proj Release Date	Commissary Balance	SPIN	Booking Type
RELEASED - 12/23/2007 10:34 AM SURETY BOND	NONE	\$0.00	1949673	FELONY

Aliases

### Charges

**Charge Number:** 1  
**Agency Report Number:** S007354395  
**Offense Description:** BURGLARY (ATTEMPTED)  
**Statute:** 810.02(4)(A)/F  
**Court Case Number:** CRC0727870CFANO  
**Bond Assessed:** \$5,000.00  
**Bond Amount Due:** \$0.00  
**Charge Status:** BONDED OUT  
**Arrest Type:** ON VIEW  
**OBTS:** 5207033349

2019 Pinellas County Sheriff's Office

P

cc

52200 YF027870 XXXXP00

103070

then & there unlawfully & without invitation attempt to enter or remain in a structure to wit: the Northside Christian School in St. Petersburg, FL with the intent to commit an offense therein. The structure at the time was closed to the public

810.02

REQUEST FOR INVESTIGATIVE COSTS, F.S. 938.27(1)					
DATE	OFFICER	HOURS	X	PAY RATE	OR COST
				208101C23	
OTHER - Describe					
Continuation sheet				Y	N
TOTAL				\$	

७

- na Justice Center, 100 Virginia Avenue, Third Floor, 12  
**FILED**  
 EITHER A or B:  
 Reverse side of this form and pay a fine in the amount of \$100.  
 DEC 24 2007  
 100 Virginia Avenue, Courtroom 15, Third Floor, Clearwater, FL 34615  
 KEN BURKE  
 Clerk of Circuit Court

No

COCR59 (A,b,c,d) 12/06





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## Seaford-based Estate Auctions ranks among top ebay sellers

▲ Alex Vuocolo ● May 24, 2013 ● Antiques, Auction Estates, eBay, Inc., Norb Novocin, online sales, seaford, Washington D.C.



Norb and Marie Novocin attending an eBay seller showcase at the Eastern Market in Washington D.C.

Norb Novocin, owner of Estate Auctions, Inc., built his entire business on ebay. The Seaford-based company has eight employees and generates up \$1 million in sales per year. His key to success: Start every auction at \$1 regardless of the item's value.

Online bidders reach the right price point on their own, he said. The average item sells for about \$150, but some bids jump into the tens of thousands. Products range from antique paintings of 18th century aristocrats to obscure historical trinkets, such as Russian nuclear launch keys from the Cold War.

"We go out there to estate auctions and buy dead people's stuff," Novocin said. "We like quirky. We like unusual."

Novocin and his wife, Marie, first started selling on ebay back in 1993. Novocin had lost his full-time job three weeks before Christmas and six weeks before the birth of their first child. To make some extra cash, he decided to hunt down cheap antiques at yard sales and estate auctions and sell them on ebay.

"We had about \$50 to work with," Novocin said. "We went out to yard sales with the rule that we could only spend \$1 per item."

That \$50 turned into \$500 in sales.

Two decades later, ebay has recognized Novocin as one of its top sellers. In May, the Seaford resident visited Capital Hill in Washington D.C. as part of a delegation of small business owners making a living on the ubiquitous e-commerce site.

Novocin spoke with legislators from both sides of the aisle, laying out a series of concerns borne out of his experience

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by Jeff Palady



**Keep it in the Fairway**  
by Chris Dohl



**'Digital Health' is Technology in Action**  
by Edmondo Robinson

**OF  
LISTS**  
DELAWARE BUSINESS TIMES EVENTS

**March 19<sup>th</sup>**  
**5:30pm – 8:30pm**  
**Christiana Hilton**

**Purchase Tickets Here**

Exhibit  
R



facebook.com



Wendy Martinez • Estate Auctions Inc

I have noticed that YOU are selling counterfeit items on Ebay such as pieces of China FROM China and listing them as French Limoges.. Besides the fact that Ebay does not allow counterfeit items to be sold do you think it is ethical to misrepresent a fake item from China and pass it off as French porcelain??

Here is your counterfeit item from China that you are selling as French porcelain...



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